

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matters of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
Petition of SBC Communications Inc. For)	WC Docket No. 04-29
Forbearance from the Application of Title II)	
Common Carrier Regulation to IP Platform)	
Services)	
)	

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, CompTel/ASCENT ("CompTel") files this Motion requesting the Commission extend the period for all interested parties to file reply comments in the above-captioned proceedings from June 28, 2004 to July 14, 2004. This brief extension of time would permit more complete responses on the issues raised in these proceedings and this modest extension would not prejudice any interested parties.

On March 10, 2004, the Commission released the IP-Enabled Services Notice of Proposed Rulemaking (FCC 04-28) ("NPRM") and on February 5, 2004, SBC filed its Petition for Forbearance for IP Platform Services. In light of the substantial overlap between the issues presented in the IP-Enabled Services NPRM and the SBC Forbearance Petition and the likelihood that parties will raise similar or identical arguments in the two proceedings, on March 30, 2004 (DA 04-899), the Commission made the comments in both proceedings due

on or before May 28, 2004, and reply comments due on or before June 28, 2004. More than 135 comments were filed in response to the NPRM and 15 on the SBC Petition, or at least 150 comments in all.

These proceedings raise critical issues as to the regulatory treatment of IP-Enabled Services and the facilities used to provide them. Particularly in light of the volume of comments that these matters have generated, the time period between May 28 and June 28 is inadequate to permit CompTel and others to provide the Commission with a full, informed reply. A brief extension of time until July 14, 2004, would greatly facilitate the development of a complete record for the Commission's review.

No prejudice to any party would result from this modest extension. The Commission has previously granted requests for extensions in similar circumstances. *See, e.g., Performance Measurements and Standards for Interstate Special Access Services*, Order, 16 FCC Rcd. 22,117 (2001); *Performance Measurements and Standards for Unbundled Network Elements and Interconnection*, Order, 16 FCC Rcd. 21,428 (2001). CompTel respectfully submits that in this proceeding as well, grant of the additional time requested would allow all interested parties a meaningful opportunity to respond to issues raised in the comments, and would assist the Commission in reaching its decision based on a complete record.

For all of these reasons, CompTel respectfully requests that the Commission grant its motion for an extension of time until July 14, 2004, to file reply comments in these proceedings.

Respectfully submitted,

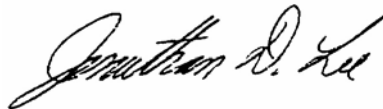
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June 8, 2004

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June, 2004, I caused true and correct copies of the forgoing Motion for Extension of Time to be served on parties listed below by electronic filing.

Marlene H. Dortch, Secretary
Federal Communications Commission
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